



RE: Comments on Segment 2 Field Tests of the Programmable Logic Control and Variable Frequency Drive Well Pumps NW Natural GASCO Site, Portland, Oregon Dated May 2011 📎

Sean Sheldrake to: John Edwards

07/16/2011 06:03 AM

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John, Bob,

In the forthcoming EECA document EPA expects NW Natural to provide additional details regarding when hydraulic capture is assessed, the criteria used for evaluating hydraulic capture and the adaptive contingency actions that can be made with sufficient lead time to ensure a sediment cap is protected from recontamination. EPA recognizes that NW Natural presents a performance monitoring plan in the May 2011 Draft Final Design, but the performance monitoring text appears to focus on real-time control wells to control well extraction rates. It is EPA's understanding that an evaluation of these wells does not represent hydraulic control for the entire groundwater flux exiting the site, thus NW Natural's plan to monitor wells instrumented with transducers that are completed in the deep aquifer below the aquitard and offshore piezometers. Therefore additional information should be presented by NW Natural that provides:

- 1) A chronological and explicit approach to assessment of complete hydraulic capture of groundwater flux exiting the site using all of the wells and piezometers instrumented with transducers, and
- 2) A contingency plan of action for modifications (infrastructure and/or management of the system) when complete hydraulic control is not achieved that is timely enough to preempt recontamination of a sediment cap. NW Natural should present a robust monitoring plan with evaluation intervals that allow analysis with sufficient lead time for timely corrective actions.

Thank you.

S

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Region 10 Dive Team: www.epa.gov/region10/dive

Portland Harbor Cleanup: www.epa.gov/region10/portlandharbor

Green Cleanups: <http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>

Green Cleanups (EPA only): <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener+cleanups>

Health and Safety (EPA only): <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/H&SecI>

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John Edwards

Hello Sean. Thanks very much for EPA's timely comments on the report, Segm...

07/13/2011 10:02:53 AM

From: John Edwards <jedwards@anchorqea.com>
To: Sean Sheldrake/R10/USEPA/US@EPA
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Date: 07/13/2011 10:02 AM
Subject: RE: Comments on Segment 2 Field Tests of the Programmable Logic Control and Variable Frequency Drive Well Pumps NW Natural GASCO Site, Portland, Oregon Dated May 2011

Hello Sean. Thanks very much for EPA's timely comments on the report, Segment 2 Field Tests of the Programmable Logic Control and Variable Frequency Drive Well Pumps, May, 2011. Many of EPA's comments will be addressed with the modeling that we plan to do using the results of the variable rate extraction well pumping tests. The planned modeling is referenced in our report and in EPA's comments. The modeling will be conducted during development of the sediment EECA. Therefore we propose to provide our response to EPA's June 30 Comments in the EECA document, rather than a separate deliverable.

We appreciate EPA's consideration of this proposal.

John Edwards

-----Original Message-----

From: Sean Shel Drake [mailto:Shel Drake.Sean@epamail.epa.gov]

Sent: Thursday, July 07, 2011 8:22 AM

To: Carl Stivers; Patty Dost; Ryan Barth; Robert Wyatt; John Edwards

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Subject: Comments on Segment 2 Field Tests of the Programmable Logic Control and Variable Frequency Drive
Well Pumps NW Natural GASCO Site, Portland, Oregon Dated May 2011

Bob, John,

Please see the attached EPA comments on the subject report.

(http://www.epa.gov/region10/pdf/ph/gasco/gascovfd_testreport_2011may25.pdf)

Please repair a response to comments & revised report within 30 days.

Thank you.

S

(See attached file: Gasco PLC VFD Testing Comments (30-June-2011).pdf)

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<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener>

+cleanups

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<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/H&Sec1>

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<http://yosemite.epa.gov/r10/extaff.nsf/Homepage/Visiting+Seattle>